

Francisco A. Villegas (Bar No. 206997)
 fvillegas@villegascefo.com
 Damir Cefo (*pro hac vice*)
 dcefo@villegascefo.com
 Mark W. Halderman (*pro hac vice*)
 mhalderman@villegascefo.com
 Evan M. Rosenbaum (Bar No. 310414)
 erosenbaum@villegascefo.com
 VILLEGAS & CEFO LLP
 1350 Avenue of the Americas, 2nd Floor
 New York, NY 10019
 Telephone: (646) 844-1071

Kyle G. Gottuso (*pro hac vice*)
 kgottuso@atllp.com
 ARMSTRONG TEASDALE LLP
 7700 Forsyth Blvd., Suite 1800
 St. Louis, MO 63105
 Telephone: (314) 621-5070

Attorneys For Plaintiff
 B.S.D. CROWN, LTD.

STEFANI E. SHANBERG (Bar No. 206717)
 sshanberg@perkinscoie.com
 NATHAN B. SABRI (Bar No. 252216)
 nsabri@perkinscoie.com
 ROBIN L. BREWER (Bar No. 253686)
 rbrewer@perkinscoie.com
 MATHIEU A. SWIDERSKI (Bar No. 330333)
 mathieuswidorski@perkinscoie.com
 KARL M. JOHNSTON (Bar No. 327446)
 kjohnston@perkinscoie.com
 PERKINS COIE LLP
 505 Howard Street, Suite 1000
 San Francisco, California 94105-3204
 Telephone: (415) 344-7000
 Facsimile: (415) 344-7050

Attorneys for Defendants
 AMAZON.COM, INC.,
 AMAZON WEB SERVICES, INC. and
 AMAZON.COM SERVICES LLC

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

BSD CROWN, LTD.,

Plaintiff,

v.

AMAZON.COM, INC., AMAZON WEB
 SERVICES, INC., and TWITCH
 INTERACTIVE, INC.,

Defendants.

Case No. 3:23-cv-00057-WHO

**JOINT CASE MANAGEMENT
 STATEMENT**

Date: April 1, 2025
 Time: 2:00 p.m.
 Location: Zoom Videoconference
 Judge: Hon. William H. Orrick

The Parties submit this joint case management statement as directed by the Court's November 26, 2024 Order. The parties incorporate by reference their previous Joint Case Management Statement (ECF Nos. 118 and 121) and submit this Further Statement to update the Court as to the status of Amazon's Request for *Ex Parte* Reexamination ("EPR"). The parties agree that this case should remain stayed at this time.

I. Prior Reexamination

This case was originally stayed on March 29, 2024, pending the resolution of an *Ex Parte* Reexamination of U.S. Patent No. 6,389,473 (the "'473 patent") filed by Third Party Unified Patents. ECF No. 109. On August 5, 2024, the USPTO issued a reexamination certificate confirming the patentability of each challenged claim in view of the asserted prior art references.

II. Current Reexamination

On August 15, 2024, Defendant Amazon.com, Inc. filed a Request for EPR of the '473 patent directed to BSD's asserted claims 1-2, 8-14, 21, and 23-24 in this litigation ("Asserted Claims"). On November 8, 2024, the USPTO issued an order granting Amazon's Request. On February 24, 2025, the USPTO issued a First Office Action rejecting all the Asserted Claims. BSD's response to the First Office Action is due on April 24, 2025.

III. Preservation of Third-Party Evidence

On February 11, 2025, BSD filed a motion for an Order for Preservation (ECF No. 123) of certain third-party evidence. An opposition and reply followed (ECF Nos. 124 and 125). A hearing is scheduled for March 26, 2025.

Respectfully submitted,

Dated: March 25, 2025

By: /s/ Francisco Villegas

Francisco A. Villegas (Bar No. 206997)
 Damir Cefo (*pro hac vice*)
 Mark W. Halderman (*pro hac vice*)
 Evan M. Rosenbaum (Bar No. 310414)
 fvillegas@villegascefo.com
 dcefo@villegascefo.com
 mhalderman@villegascefo.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

erosenbaum@villegascefo.com
VILLEGAS & CEFO LLP
1350 Avenue of the Americas, 2nd Floor
New York, NY 10019
Telephone: (646) 844-1071

Kyle G. Gottuso (*pro hac vice*)
ARMSTRONG TEASDALE LLP
d7700 Forsyth Blvd., Suite 1800
St. Louis, MO 63105
Telephone: (314) 621-5070
kgottuso@atllp.com

*Attorneys for Plaintiff
BSD Crown, Ltd.*

By: /s/ Nathan B. Sabri

Stefani E. Shanberg (Bar No. 206717)
sshanberg@perkinscoie.com
Nathan B. Sabri (Bar No. 252216)
nsabri@perkinscoie.com
Robin L. Brewer (Bar No. 253686)
rbrewer@perkinscoie.com
Mathieu A. Swiderski (Bar No. 330333)
mathieuswiderski@perkinscoie.com
Karl M. Johnston (Bar No. 327446)
kjohnston@perkinscoie.com
PERKINS COIE LLP
505 Howard Street, Suite 1000
San Francisco, California 94105-3204
Telephone: (415) 344-7000

*Attorneys for Defendants
Amazon.com, Inc.,
Amazon Web Services, Inc., and
Amazon.com Services LLC*

ATTESTATION CLAUSE

I, Francisco Villegas, am the ECF user whose credentials were used in this filing. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have consented to the filing of this document.

Dated: March 25, 2025

By: /s/ Francisco A. Villegas